

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL RODGERS  
PLAINTIFF,

V.

THE CITY OF PHILADELPHIA  
AND C.O. DAMION SAMUELS  
DEFENDANTS

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CIVIL ACTION

No. 07-3613

MOTION FOR AN ORDER  
COMPELLING DISCOVERY

Plaintiff move this court for an order pursuant to Rule 37(a) of the Federal Rules of Civil Procedure compelling Defendants, City of Philadelphia and C.O. Damion Samuels to answer fully interrogatories number (1-3), copies of which are attached hereto. Plaintiff submitted these interrogatories, pursuant to Rule 33 of the Federal Rules of Civil Procedure on October 07, 2008 but have not yet received the answers.

Plaintiff move this court for an order pursuant to Rule 37(a) of Federal Rules of Civil Procedure compelling Defendants, City of Philadelphia and C.O. Damion Samuels to produce for inspection and copying the following documents which are attached hereto. Plaintiff submitted a written request for these documents, pursuant to Rule 34 of the Federal Rules of Civil Procedure on October 07, 2008 but have not received the

documents.

Plaintiff also move for an order pursuant to Rule 37(a)(4) requiring the aforesaid Defendants to pay Plaintiff the sum of whatever the courts deems appropriate as reasonable expenses in obtaining this order, on the ground that the Defendants refusal to answer the interrogatories or produce the documents had no substantial justification.

DATE: NOVEMBER 13, 2008

SIGNED: Michael Rodgers  
MICHAEL RODGERS

DOC # BW9911

1600 WALTERS MILL RD.  
SOMERSET PA. 15510

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL RODGERS  
Plaintiff,

v.

CITY OF PHILADELPHIA

AND C.O. DAMION SAMUELS

CIVIL ACTION

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No. 07-3613

PLAINTIFF'S FIRST SET OF  
INTERROGATORIES TO DEFENDANTS

In accordance with Rule 33 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendants, CITY OF PHILADELPHIA and C.O. DAMION SAMUELS answer the following interrogatories under oath, and that the answers be signed by the person making them and be served on plaintiff within 30 days of service of these interrogatories.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. State the name and address or otherwise identify and locate any person who, to you or your attorney's knowledge, claims to know of facts

relevant to the conduct described in these interrogatories.

2. Identify and attach a copy of any and all documents relating to prison medical center staff training and education.

3. Identify and attach a copy of any and all documents showing who was on duty in Unit A1 cell block 3 at approximately 7am to 11:54 pm April 3, 2006.

Michael Rodgers

MR. MICHAEL RODGERS

DOC # GW9911

1600 WALTERS MILL Rd.

SOMERSET, PA. 15510

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL RODGERS  
Plaintiff,

v.

CITY OF PHILADELPHIA  
AND C.O. DAMION SAMUELS

• CIVIL ACTION  
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• NO. 07-3413  
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PLAINTIFF'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant, CITY OF PHILADELPHIA and C.O. DAMON SAMUELS produce for inspection and copying the following documents:

1. All written statements, originals or copies, identifiable as reports about the incident on March 3-4, 2006, made by prison and CIVILIAN employees or the Department of Corrections and prisoner witnesses.
2. Any and all medical records of Plaintiff from the time of his incarceration in Curran-Fremhold Correctional Facility to the date of this request.
3. All investigation and findings about the incident on March 3-4, 2006 conducted by the PHILADELPHIA INTERNAL AFFAIRS.
4. Any and all rules, regulations, and policies of PHILADELPHIA DEPARTMENT OF CORRECTIONS about

. treatment of prisoners who sustained injuries  
by assault.

5. Any and all information regarding transfer  
reports to an outside Hospital for emergency  
treatment and observation.

MR MICHAEL RODGERS  
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1600 WALTERS MILL Rd.  
SOMERSET PA. 15510